

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SETH VILLAFAN, a single man; WOLFGANG
OLSON, a single man; and JOSH GRAVES, a
married but separated man,

Plaintiffs,

v.

NORTHWEST MOTORSPORT, LLC, a
Washington limited liability company; HILT
VENTURE CAP INC., a Washington limited
liability company; DONALD FLEMING and
JANE DOE FLEMING, residents of Montana,
and the marital community composed
thereof; NORTHWEST MOTORSPORT, INC.,
a Washington corporation; RICHARD FORD
and JANE DOE FORD, residents of Texas,
and the marital community composed
thereof; RFJ AUTO PARTNERS NORTHERN
HOLDINGS, INC., a Delaware corporation;
JOHN and JANE DOES 1-5 and the marital
communities composed thereof; and RFJ
AUTO GROUP, INC., a foreign corporation,

Defendants.

NO. 2:20-cv-01616 TSZ

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF DEADLINE
FOR FILING MOTIONS RELATED
TO CLASS CERTIFICATION**

CLERK'S ACTION REQUIRED

**NOTE ON MOTION CALENDAR:
TUESDAY, NOVEMBER 8, 2022**

**STIPULATED MOTION AND ORDER FOR
EXTENSION OF DEADLINE FOR FILING MOTIONS
RELATED TO CLASS CERTIFICATION - 1**
No. 2:20-cv-01616 TSZ

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I. STIPULATED REQUESTED RELIEF

Pursuant to LCR 7(j) and LCR 10(g), the parties to this action, hereby stipulate and jointly request relief regarding the deadline for filing motions related to class certification.

Event	Current Deadline	Proposed Deadline
Deadline for filing motions related to class certification	November 10, 2022	November 17, 2022

The parties agree that the current deadline for filing motions related to class certification should be extended by one week. Good cause exists for this extension of time on this deadline as an expert for the Plaintiffs has recently fallen ill with Covid-19 and is recovering. Furthermore, recent inclement weather has caused Plaintiffs' counsel to be unable to fully participate in the class certification process given their lack of reliable access to the internet.

Based on the foregoing, counsel for the parties has conferred and agreed that an extension of the deadline for filing motions related to class certification is warranted. The parties hereby stipulate to the proposed extension.

IT IS SO STIPULATED, and a proposed order consistent with LCR 10(g) is attached herewith. The parties respectfully request entry of the subjoined order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

1 DATED this 8th day of November, 2022.

2 Law Offices of Eugene N. Bolin, Jr., PS
3 By: s/Eugene N. Bolin, Jr.

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10 *Attorney for Plaintiffs*

DATED this 8th day of November, 2022.

Forsberg & Umlauf, P.S.

By: /s/ Paul Smith

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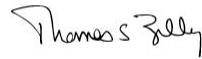
ORDER

This matter, having come before the Court on the above-stipulated motion, IT IS
SO ORDERED THAT:

1. Relief is granted to extend the following deadline:

Event	Current Deadline	New Deadline
Deadline for filing motions related to class certification	November 10, 2022	November 17, 2022

Dated this 9th day of November, 2022.



THE HONORABLE THOMAS S. ZILLY

DECLARATION OF SERVICE

I hereby certify that on the 8th day of November, 2022, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

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Motorsport, LLC, Northwest Motorsport,

Inc., Donald Fleming, Richard Ford, RFJ

Auto Partners Northern Holdings, Inc., RFJ

Auto Group, Inc.

I affirm under the laws of the State of Washington and the United States that the foregoing is true and correct to the best of my knowledge.

DATED this 8th day of November, 2022, at Edmonds, WA.

LAW OFFICES OF EUGENE N. BOLIN, JR., P.S.

s/Eugene N. Bolin, Jr.

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